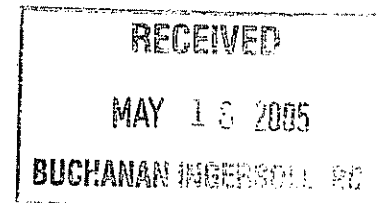


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May 10, 2005

VIA FACSIMILE (412) 562-1041

Bryan H. Opalko, Esquire
Buchanan Ingersoll P.C.
One Oxford Centre
301 Grant Street
Pittsburgh, Pennsylvania 15219

Re: Haynes International, Inc. v. Electralloy

Dear Mr. Opalko:

I write in response to your letter dated May 4, 2005, in which you provide available dates for the individual depositions of Paul Manning, Jim Laird, and Lee Flowers; and Paul Manning as the Rule 30(b)(6) deponent. Please confirm that Paul Manning will be knowledgeable with respect to each of the deposition subjects referenced in the Rule 30(b)(6) deposition notice. We agree to the deposition dates of June 2-3, 2005. However, additional dates will likely be necessary in order to allow sufficient time to take the four previously noticed depositions. Accordingly, please provide additional dates for the remaining depositions.

Furthermore, we do not consent to taking the depositions of Plaintiff's witnesses in Kokomo, Indiana. The depositions will take place in Pittsburgh, Pennsylvania, or another mutually designated location within the district of the litigation. Plaintiffs are required to appear to be deposed in the district in which suit is brought. See McClain v. Camouflage Assocs., No. Civ. A. 94-0994, 1994 WL 105814, at *1 (E.D. Pa. Mar. 25, 1994) ("[I]t is well established that the plaintiff must make himself available for deposition in the district in which he has brought suit."). Assuming some of Plaintiff's witnesses remain

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Bryan H. Opalko, Esquire
May 10, 2005
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available to be deposed on June 2-3, 2005, we will follow-up with the address where the depositions will take place.

Finally, given the impending deadline for the close of discovery in this matter on June 7, 2005, we suggest a second joint extension of the discovery deadlines would be appropriate. At your earliest convenience, please contact me to discuss the matter further.

Sincerely,

JENNIFER L. MILLER

JLM/

cc: Timothy D. Pecsénye, Esquire